

VAST-TEL COMMUNICATIONS, INC.

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REGULATORY AUTH.

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OFFICE OF THE  
EXECUTIVE SECRETARY

**RECEIVED**  
ADMINISTRATIVE

MAY 12 1999

May 7, 1999

In Re: Dialing Parity Plan

TN REGULATORY AUTHORITY

*JK*

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

99-00367

Dear Mr. Waddell,

As per the requirements of the Tennessee Regulatory Authority, enclosed is the original and thirteen (13) copies of Vast-Tel Communications, Inc. intraLATA toll dialing parity plan. Also enclosed is the \$25.00 filing fee.

If there are any questions for clarification or additional information concerning this matter, please contact me at (940) 683-6678 or send correspondence to 1703-A 16<sup>th</sup> Street, Bridgeport, TX 76426.

Sincerely,

*Randell Brooks*

Randell Brooks  
Vice President  
Vast-Tel Communications, Inc.

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OFFICE OF THE  
EXECUTIVE SECRETARY

**Intralata Toll**

**Dialing Parity**

**Plan**

99-00367

**Vast-Tel Communications, Inc.**

**Tennessee**

**May 1, 1999**

## **I. Purpose**

The intent of this plan is to provide a proposal that upon implementation would provide qualified customers the ability to select the telecommunications carrier of their choice for routing their intraLATA toll calls.

## **II. Definitions**

For the Purpose of this plan, the following definitions are used.

Dual PIC- The ability to assign a PIC Code that designates a carrier for the transmission of both IntraLATA and InterLATA toll calls.

ILEC- Incumbent Local Exchange Provider. The underlying carrier in a given service area which provides the basic elements necessary in the provisioning of local telephone service.

InterLATA- Services, which originate and terminate in the different local access and transport areas.

IntraLATA- Services, which originate and terminate in the same local access and transport area.

IntraLATA Dialing Parity- A plan that allows a consumer to choose the service provider for IntraLATA toll calls based on a list of available carriers in the service area.

LATA- Local Access and Transport Area.

PIC- Primary Interexchange Carrier. A carrier that provides telecommunications transmission services between exchanges.

PIC Code- A code assigned to Interexchange Carriers as a means of unified identification throughout the telecommunications industry.

Qualified Customer- Any customer of Vast-Tel Communications, Inc. which has the ability to make toll calls. Customers may elect to have toll blocks placed on their service and as such cannot place toll calls and are not considered qualified for IntraLATA Dialing Parity due to this election.

Slamming- The act of changing a telecommunications carrier without the knowledge and consent of the customer.

Toll Block- The election of by a customer for a feature on their telephone service that blocks toll calls thereby eliminating access to Interexchange Carriers.

## **III. Current Position**

Vast-Tel Communications, Inc. is a reseller of wholesale services offered by an ILEC. Our company, at this time, does not own any switching equipment and must rely on the local ILEC to provide IntraLATA Toll Dialing Parity to our company in order to provide it to our local customers. Since the requirement to provide these services ultimately falls to the company which owns the switching equipment, Vast-Tel will make IntraLATA Toll Dialing Parity available in those areas where the ILEC has met the requirements of the order.

Vast-Tel Communications, Inc. under Section 251(f)(2), qualifies for a modification of the requirements of Section 251(b) due to the fact that it is technically infeasible and economically burdensome for our company to maintain a current list of exchanges on file with each state in which we operate. Vast-Tel Communications, Inc. currently seeks certification as a reseller in virtually every exchange with the State of Tennessee. As a reseller, our customer base is very volatile, with a turnover rate as high as 10% per month. In as much, we may only have 1 customer in any given exchange during any given month and that customer remain only 30 days as a customer of record. Vast-Tel Communications, Inc. respectfully requests a modification to the

requirements exempting us from maintaining a current list of exchanges and allowing the following statement to meet those requirements:

“Vast-Tel Communications, Inc. is licensed by the Tennessee Regulatory Authority as a reseller to provide service to every exchange within the State of Tennessee. As such, Vast-Tel will provide IntraLATA Dialing Parity in areas where IntraLATA Dialing Parity is offered by the ILEC.”

#### **IV. Implementation**

Vast-Tel Communications, Inc. currently offers all customers with the ability to make a choice in all areas where the dual PIC procedure is in place and the customer has the ability to place toll calls. For those ILECs that have not implemented IntraLATA Dialing Parity at the date of this writing, our company has every intention to offer the service upon its availability.

#### **V. Carrier Selection Process**

Vast-Tel Communications, Inc. subscribes to the 2-PIC carrier selection methodology. With the 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for InterLATA toll calls and presubscribe to the same or a different participating telecommunications carrier for IntraLATA toll calls.

Vast-Tel employees who communicate to the public, accept customer orders and serve in the customer service capacities will be trained to explain the process to all qualified customers in making PIC changes for intraLATA toll calls. The customer may choose from a list of available carriers. The customer's IntraLATA choice will be recorded in the same manner as the customer's long distance carrier in recorded and passed on to the business office.

Business office personnel will make the necessary changes to the customer's record based upon the requests from the customer. Customers making PIC changes within the first 90 days after implementation of this plan will be able to change their PIC choice for IntraLATA toll service without cost. Customers making PIC changes after the first 90 days following implementation of this plan will be charged a PIC change charge according to the current tariff filed with the Regulatory Authority in the state where the service is provided.

Vast-Tel Communications, Inc. is licensed and its operations regulated by the Tennessee Regulatory Authority. As such, the company will abide by all applicable rules of the Authority and the FCC. Vast-Tel will be subject to the Rule related to “slamming” as indicated in Tennessee Regulatory Authority Rule 1220-4-2-.56, Sections (2)-(6).

#### **VI. Customer Notification/Education**

Official notification of IntraLATA Dialing Parity will be done via an insert in the regular monthly billing to existing customers. Customers will have 90 days after the implementation to submit a PIC change at no charge. After 90 days, Vast-Tel will assess a PIC change charge in accordance with the governing tariff.

#### **VII. Access to Operator Services and Directory Assistance**

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or InterLATA carrier.